#### **REMARKS**

Claims 1-16 remain pending in the present application. Claims 1-16 are rejected. Claims 17-23 are canceled. No new matter has been added.

## Claim Rejections - 35 U.S.C. §103(a)

### Claims 1-16

The present office action states that Claims 1-16 are rejected under 35 U.S.C. § 103(a) as being unpatentable over by Huffman et al. (2005/0086397), hereinafter "Huffman" in view of Feldman et al. (2003/0115147), hereinafter "Feldman".

Applicants respectfully submit Claim 1 (and similarly Claim 9) includes the features, "polling a media device of a computing system for a media change wherein said polling of said media device cannot be blocked by said computing system." (emphasis added).

To support the obviousness rejection of the Claimed features, the Office action cites, "[see (Huffman et al. Paragraph 15 Lines 10-15; Paragraph 17 Lines 1-4; Paragraph 18 Lines 1-2; Paragraph 28 Lines 6-7) where Huffman et al. teaches that the polling of the media device for a media change utilizes Direct Memory Access on the host bus with interrupt notification that cannot be blocked]". (Emphasis Added)

However, Applicants have reviewed Huffman, including the cited portion and <u>find no teaching of</u> Huffman with respect to the features, "polling a media device of a computing system for a media change wherein said <u>polling of said media device</u> **cannot be blocked by said computing system**." (Emphasis added).

In the previous response, after unsuccessfully finding the cited teachings of Huffman as stated in the Office Action, <u>Applicants respectfully requested</u> the specific location of the teaching by Huffman or withdrawal of the rejection as being improper.

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Applicants note that no additional direction has been provided. As such, Applicants have provided the verbatim text of the cited portions of Huffman herein to specifically show that nowhere in the cited portions of Huffman have the claimed features, "polling a media device of a computing system for a media change wherein said polling of said media device cannot be blocked by said computing system" been shown.

### **A. Paragraph 15 (Lines 10-15 in bold)** of Huffman states:

"To determine whether or not the removable media 120 is currently present in (or at) the storage device 110, the host system 130 could synchronously poll the storage device 110. Such an approach, however, might prevent the storage device 110 and/or host system 130 (e.g., a processor or chipset associated with the host system 130) from entering a lower-power state. For example, the storage device 110 might need to remain in a "standby" state as opposed to a lower-power "sleep" state in order to respond to the polling. Similarly, the polling might require Direct Memory Access (DMA) bus activity at the host system 130—preventing a processor at the host system 130 from entering a lower-power C3 or C4 power state as described in the Advanced Configuration and Power Interface (ACPI) Specification Revision 2.0b (October, 2002). As a result, the system 100 might consume a significant amount of power in order to determine whether or not the removable media 120 is present (e.g., reducing the battery life of a mobile computer system)." (Emphasis Added)

In contrast to rendering obvious the claimed features, "polling a media device of a computing system for a media change wherein said <u>polling of said media device</u> cannot be blocked by said computing system." Applicants submit the above paragraph, in context, is not understood to provide any teaching regarding the computing system unable to block the polling of the media device.

Moreover, Applicants understand the above paragraph to teach <u>the host system</u> as the component polling the storage device.

Thus, Applicants submit that **Paragraph 15 Lines 10-15** of Huffman not only does not teach or render obvious the features, "polling a media device of a computing system for a media change wherein said <u>polling of said media device</u> cannot be blocked

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by said computing system." Paragraph 15 of Huffman appears to Applicants to teach away from the claimed features. Further, to modify Huffman to render obvious the claimed features would change the method of operation of Huffman.

## **B. Paragraph 17 Lines 1-4** of Huffman states:

"At **202**, it is determined at a storage device that a current media status has changed. For example, it might be determined that tape cartridge has been inserted into or removed from the storage device." (Emphasis Added)

In contrast to rendering obvious the claimed features, "polling a media device of a computing system for a media change wherein said <u>polling of said media device</u> cannot be blocked by said computing system." Applicants submit the above paragraph, in context, is **not understood** to <u>provide any teaching</u> regarding the computing system unable to block the polling of the media device.

Thus, Applicants submit that **Paragraph 17 Lines 1-4** of Huffman does not teach or render obvious the features, "polling a media device of a computing system for a media change wherein said <u>polling of said media device</u> cannot be blocked by said computing system."

# C. Paragraph 18 (Lines 1-2 in bold) of Huffman states:

"At 204, an asynchronous message is transmitted to a host system as a result of the determination. Moreover, the asynchronous message is a message that could also be transmitted for a reason other than a current media status change." (Emphasis Added)

Instead of rendering obvious the claimed features, "polling a media device of a computing system for a media change wherein said <u>polling of said media device</u> cannot be blocked by said computing system." Applicants submit the above paragraph, in context, is not understood to provide any teaching regarding the computing system unable to block the polling of the media device.

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Moreover, Applicants submit that the <u>asynchronous message</u> as discussed in **Paragraph 18 Lines 1-2** of Huffman <u>could be blocked</u>. As such, the present Claimed features, "polling a media device of a computing system for a media change wherein said <u>polling of said media device</u> **cannot be blocked by said computing system**" is not taught or rendered obvious by Huffman, but instead would be a <u>valuable inventive</u> resource that would work in collaboration with Huffman.

# **D. Paragraph 28 (Lines 6-7 in bold)** of Huffman states:

"FIG. 5 is a flow chart of a serial ATA interface method according to some embodiments. The method may be performed, for example, by the host system 430 of FIG. 4. At 502, a Set Device Bits packet is received by a host bus adapter which in turn updates a register (e.g., an SNotification register). The host bus adapter may also generate an interrupt to a host processor at 504. A storage device driver executing at the host processor may then process the interrupt, such as by executing an Interrupt Service Routine (ISR)." (Emphasis Added)

Again, in contrast to rendering obvious the claimed features, "polling a media device of a computing system for a media change wherein said polling of said media device cannot be blocked by said computing system." Applicants submit the above paragraph, in context, is not understood to provide any teaching regarding the computing system unable to block the polling of the media device.

Moreover, Applicants submit that the <u>interrupt</u> as discussed in **Paragraph 28 Lines 6-7** of Huffman <u>could be blocked</u>. As such, the present Claimed features, "polling a media device of a computing system for a media change wherein said <u>polling of said</u> <u>media device</u> **cannot be blocked by said computing system**" is not taught or rendered obvious by Huffman, but instead would be a <u>valuable inventive resource</u> that would work in collaboration with Huffman.

For these reasons, Applicants respectfully submit that Huffman et al. does not teach or render obvious the features recited in independent Claims 1 and 9.

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With respect to Feldman, Applicants have reviewed Feldman and do not understand Feldman to overcome the shortcomings of Huffman as described herein.

As such, Applicants respectfully submit that Huffman in view of Feldman fails to teach or render obvious the features recited in independent Claims 1 and 9. Therefore, Applicants respectfully submit that Independent Claims 1 and 9 overcome the rejections under 35 U.S.C. §103(a), and are thus in condition for allowance.

With respect to Claims 2-8 and 10-16, Applicants respectfully point out that Claims 2-8 and 10-16 depend from allowable independent Claims 1 and 9 and recite further embodiments of the present claimed invention. Therefore, Applicants respectfully submit that Claims 2-8 and 10-16 overcome the rejections under 35 U.S.C. §103(a), and that these claims are thus in a condition for allowance as being dependent on allowable base Claims.

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### **CONCLUSION**

Based on the arguments presented above, Applicants respectfully assert that Claims 1-16 overcome the rejections of record, and therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted, Wagner Blecher LLP

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